

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

A.L.S. ENTERPRISES, INC.,

Plaintiff,

v.

Case No. 1:14-cv-00500

Hon. Gordon J. Quist

ROBINSON OUTDOOR PRODUCTS, LLC,

Defendant.

VARNUM LLP
Timothy E. Eagle (P38183)
Adam J. Brody (P62035)
Attorneys for Plaintiff
333 Bridge Street N.W.
Grand Rapids, MI 49504
(616) 336-6000
teeagle@varnumlaw.com
ajbrody@varnumlaw.com

SECREST WARDLE
Justin L. Cole (P68139)
Henry S. Emrich (P29948)
Attorneys for Defendant
2025 East Beltline S.E., Suite 600
Grand Rapids, MI 49546
(616) 285-0143
jcole@secrestwardle.com
hemrich@secrestwardle.com

FOLEY & LARDNER LLP
Naikang Tsao, WI State Bar No. 1036747
Attorneys for Plaintiff
150 East Gilman Street
Madison, WI 53703
(608) 258-4250
ntsao@foley.com

MOTION TO COMPEL PRODUCTION OF DOCUMENTS

Plaintiff A.L.S. Enterprises, Inc. (“A.L.S.”), by and through its attorneys, Varnum LLP and Foley & Lardner LLP, hereby moves this Court pursuant to Fed. R. Civ. P. 37 for an order compelling the defendant to: (1) supplement its answers to ALS’s interrogatories numbers two and three; (2) provide a written response to ALS’s third set of document requests; and (3) cure the deficiencies in its document productions to date, which are set forth in more detail in the

accompanying Brief in Support of Motion to Compel Production of Documents. ALS further requests that the Court enter a deadline for Robinson to comply with its order.

ALS certifies that it has in good faith conferred with Robinson in accordance with Fed. R. Civ. P. 37(a)(1) and Local Rule 7.1(d) in an attempt to resolve this dispute without court intervention. The efforts ALS made to resolve this dispute are set forth in the accompanying Brief.

Dated this 22nd day of July, 2015.

VARNUM LLP
Timothy E. Eagle (P38183)
Adam J. Brody (P62035)
333 Bridge Street, N.W.
Grand Rapids, MI 49501-0352
Telephone: (616) 336-6000
Facsimile: (616) 336-7000
teeagle@varnumlaw.com
ajbrody@varnumlaw.com

Of Counsel:

/s/ Naikang Tsao
Naikang Tsao, WI State Bar No. 1036747
FOLEY & LARDNER LLP
150 East Gilman Street
Madison, WI 53703-1481
Telephone: (608) 258-4250
Facsimile: (608) 258-4258
ntsao@foley.com

Attorneys for Plaintiff A.L.S. Enterprises, Inc.